

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE DIRECTOR
P O Box 176 Jefferson City MO 65102 0176

January 10, 2002

Mr Tony Petruska
U S Environmental Protection Agency
901 N 5th St
Kansas City, KS 66101

8717
Site: Herculaneum Road
ID # MO Docket 373
Break 20
Other 1-10-02

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JAN 15 2002
SUPERFUND DIVISION

Dear Mr Petruska

I have reviewed the Community Soil Cleanup Plan dated January 4, 2002, and have a question and a couple of comments

The assumption made in the preparation of this plan by EPA is that Doe Run will not be preparing a similar plan as required by the original AOC Will there be a cover letter to Doe Run which relieves them from this requirement? Will they be required to submit an additional plan for residential properties requiring cleanup beyond the scope of the most recent agreement with Doe Run?

I have two specific comments

- 1 I don't agree with yard soil replacement that extends only 100 feet from the home It is possible that children could play over 100 feet from the home, and that a play area could be located now, or in the future, beyond that point Also, tracking of contaminated soil into the house will remain an issue for remediated yards larger than 100 feet
- 2 Some of the backfill Doe Run has been using has been of relatively poor agronomic quality I suggest adding language to compel Doe Run to use backfill soil that is at least as good, if not better, quality than the soil that is being excavated

If you have any questions, I can be reached at (573) 751-1288

Sincerely,


David E Mosby, R G
Project Manager

DM kc

c Mr Bruce Morrison, Environmental Protection Agency, Superfund

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